

Amendments to the Drawings:

The Examiner objected to the drawings stating that the clock line of memory element 334 is misnumbered. Applicants have filed a replacement sheet that includes a proposed drawing change to change the number of the clock line of memory element 334 from 320 to 326.

Attachment: Replacement Sheet
Annotated Sheet Showing Changes

REMARKS/ARGUMENTS

Amendments were made to the specification to correct errors and to clarify the specification. No new matter has been added by any of the amendments to the specification.

Claims 1-20 are pending in the present application. Claims 1, 8, 15, and 16 were amended. Reconsideration of the claims is respectfully requested.

Also, Applicants have submitted proposed corrections to the drawing labeled Figure 3 [as suggested by the examiner]. These changes will be incorporated into a formal set of drawings upon approval of the proposed changes by the examiner.

Applicants have amended claims 1, 8, and 16 to describe receiving, by a device driver layer from at least one application in an application layer, a request to perform a device access operation on an end device on a bus. The device driver layer includes at least one device driver that communicates with the end device utilizing the bus. The device driver layer determines whether the end device is locked. Responsive to the end device not being locked, the device driver layer locks the end device and performs the device access operation.

Applicants have amended claim 15 to describe at least one application in an application layer. The driver layer includes a wrapper layer. The driver layer includes at least one device driver that communicates with the at least one end device utilizing the bus. The wrapper layer receives a request from the at least one application to perform a device access operation on the at least one end device.

One example of support for these amendments can found in Applicants' specification on page 11, line 9, through page 12, line 10.

The Examiner has rejected claims 1-20 under 35 U.S.C. § 102 as being anticipated by U.S. Patent 6,401,110 issued to *Freitas*. This rejection, as it might be applied to the claims as amended, is respectfully traversed.

Freitas teaches adapters that are coupled to storage devices through a SCSI bus. Each storage device is coupled to the SCSI bus through a device controller.

The Examiner appears to believe that the adapters 154 and 156 of *Freitas* are analogous to Applicants' claimed wrapper layer, the SCSI bus 158 is analogous to Applicants' claimed bus, the storage devices 160, 162, and 164 are analogous to Applicants' claimed end device, and controllers 166, 168, and 170 are analogous to Applicants' claimed driver layer.

Regarding amended claims 1, 8, and 16, if elements 166, 168, and 170 are indeed analogous to a device driver layer claimed by Applicants, elements 166, 168, and 170 must include at least one device driver. Further, these elements must include a device driver that communicates with the end device using the bus. These elements do not include any device driver and certainly do not include a device driver that communicates with the end device using the bus.

Elements 166, 168, and 170 are described by *Freitas* as being device controllers. A device controller is not the same thing as a device driver. A device driver is defined by Microsoft Computer Dictionary, Fifth Edition, published 2002 as “a software component that permits a computer system to communicate with a device”. The device controllers 166, 168, and 170 are not described by *Freitas* as including a software component that permits a computer system to communicate with a device. The device controllers 166, 168, and 170 are not analogous to Applicants’ claimed device driver layer. Therefore, *Freitas* does not anticipate Applicants’ claims.

Applicants also claim the device driver communicating with the end device utilizing the bus. If, as the Examiner appears to believe, the device controllers 166, 168, and 170 are analogous to Applicants’ device driver layer, SCSI bus 158 is analogous to Applicants’ bus, and storage devices 160, 162, and 164 are analogous to Applicants’ end device, then *Freitas* must teach the device controllers 166, 168, and 170 communicating with storage devices 160, 162, and 164 using SCSI bus 158. This is not what *Freitas* teaches, however. The device controllers are located between the SCSI bus and the storage devices. The device controllers communicate with the storage devices a connection depicted in Figure 1B that is not described. This connection, however, is not the SCSI bus. The device controllers cannot communicate with the storage devices using the SCSI bus. The device controllers 166, 168, and 170 are not analogous to Applicants’ claimed device driver layer. Therefore, *Freitas* does not anticipate Applicants’ claims.

Applicants also claim the device driver layer receiving a request from at least one application included in an application layer. The Examiner states that *Freitas* teaches an application at column 6, line 66 through column 7, line 17. This section of *Freitas* does not teach an application layer. This section does not teach an application that is included in an application layer. This section does not teach a device driver layer receiving, from an application that is included in an application layer, a request. Therefore, *Freitas* does not anticipate Applicants’ claims.

Regarding amended claim 15, for the reasons given above, *Freitas* does not teach at least one application that is included in an application layer, and does not teach a driver layer that includes at least one device driver that communicates with at least one end device utilizing the bus.

Claim 15 also describes the driver layer including a wrapper layer. The wrapper layer receives a request from the at least one application.

The Examiner states that *Freitas* teaches a wrapper layer by teaching elements 154 and 156. Elements 154 and 156 are not, however, analogous to the wrapper layer described by Applicants’ claims. The wrapper layer described by Applicants’ claims is included within the driver layer. The Examiner appears to believe the controllers 166, 168, and 170 are analogous to the driver layer claimed by Applicants. If the controllers 166, 168, and 170 are analogous to the driver layer and elements 154 and 156 are analogous to the wrapper layer, then elements 154 and 156 must be included within controllers

166, 168, and 170. Elements 154 and 156 are not, however, included within controllers 166, 168, and 170. Figure 1B of *Freitas* clearly shows elements 154 and 156 being separate from controllers 166, 168, and 170. Therefore, elements 154 and 156 are not analogous to the wrapper layer claimed by Applicants. Because elements 154 and 156 are not analogous to the wrapper layer claimed by Applicants, *Freitas* does not anticipate Applicants' claims.

Freitas does not teach a device driver layer, a device driver layer that includes a device driver, a device driver layer that includes a device driver that communicates with an end device using a bus, an application in an application layer, the device driver layer receiving a request from an application in an application layer, or a driver layer that includes a wrapper layer. Because *Freitas* does not teach these features, *Freitas* does not anticipate Applicants' claims.

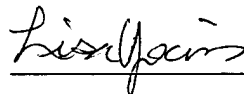
The remaining claims depend from the claims discussed above and are not anticipated by *Freitas* for the reasons given above.

It is respectfully urged that the subject application is patentable over *Freitas* and is now in condition for allowance.

The examiner is invited to call the undersigned at the below-listed telephone number if in the opinion of the examiner such a telephone conference would expedite or aid the prosecution and examination of this application.

DATE: 03.02.06

Respectfully submitted,



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Boecker et al.

Device Address Locking to Facilitate Optimum
Usage of the Industry Standard IIC Bus

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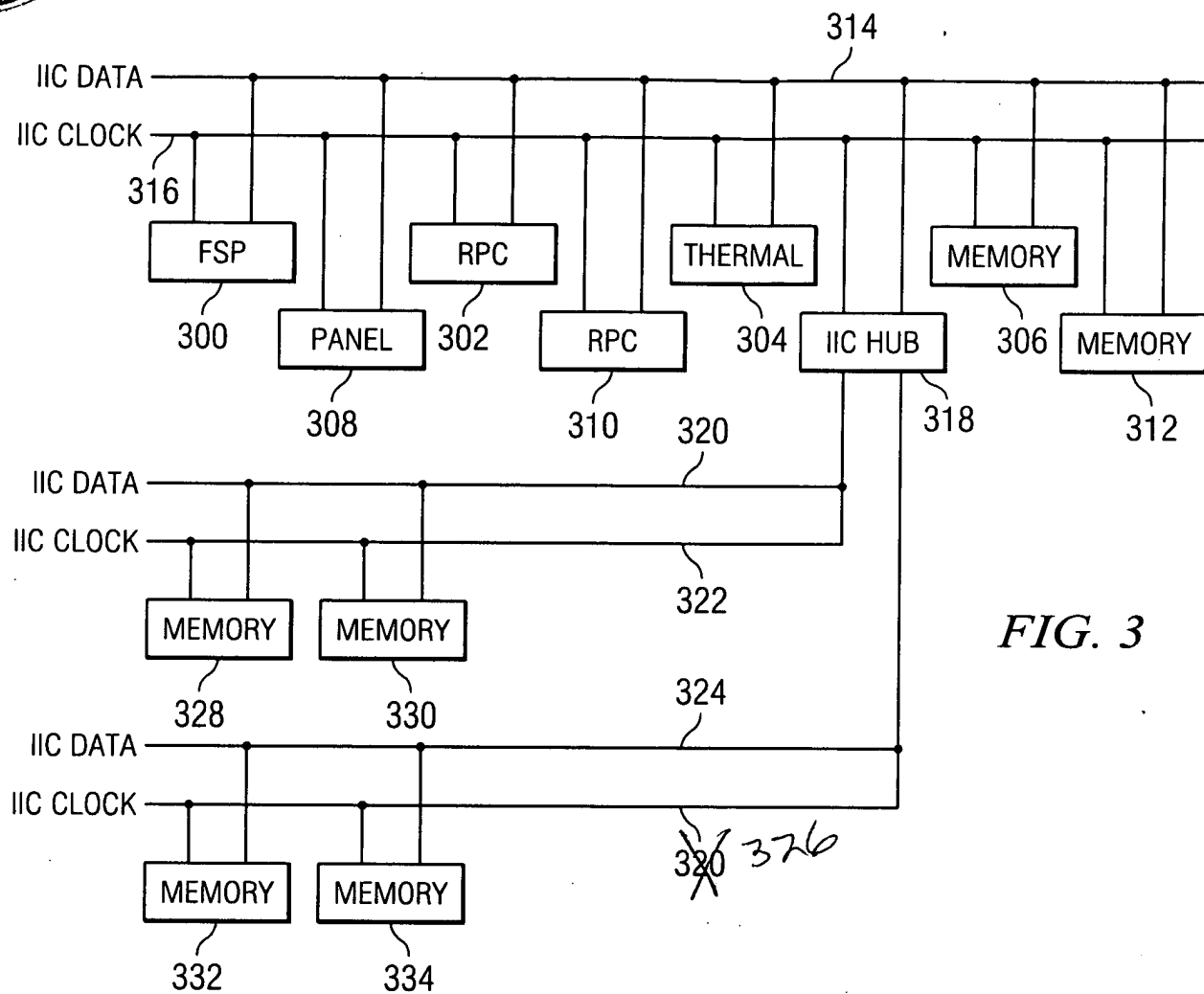


FIG. 3

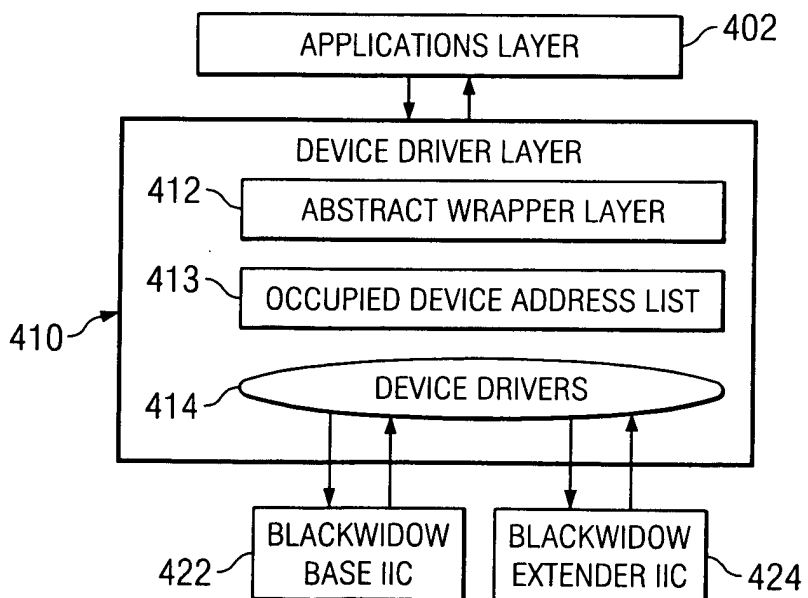


FIG. 4